

FORM 1 GENERAL	 ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td colspan="2">I. EPA I.D. NUMBER</td> <td colspan="2">II. POLLUTANT CHARACTERISTICS</td> </tr> <tr> <td colspan="2" style="height: 100px; vertical-align: middle; text-align: center;"> PLEASE PLACE LABEL IN THIS SPACE </td> <td colspan="2" style="vertical-align: top;"> GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected. </td> </tr> </table>	I. EPA I.D. NUMBER		II. POLLUTANT CHARACTERISTICS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
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INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production; inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	Belle River Power Plant
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IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	Sterling, M. Director, Env. Aff.	313	237 8618

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	2000 Second Avenue	Detroit	MI	48226	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	4901 Pointe Drive	St. Clair	Belle River	MI	48072	74	

TINUED FROM THE FRONT

SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
4 9 11 (specify) Electric Generating Station										7 (specify)									
C. THIRD										D. FOURTH									
(specify)										(specify)									

OPERATOR INFORMATION

A. NAME																																																												B. Is the name listed in Item VIII-A also the owner?									
Detroit Edison Company																																																												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																														D. PHONE (area code & no.)																													
FEDERAL M = PUBLIC (other than federal or state) STATE O = OTHER (specify) PRIVATE P (specify) Corporation																														3 1 3 2 3 7 8 0 0 0 15 16 17 18 19 20 21 22 23 24																													

E. STREET OR P.O. BOX																																																											
000 Second Avenue																																																											

F. CITY OR TOWN																														G. STATE										H. ZIP CODE										IX. INDIAN LAND									
Detroit																														MI										4 8 2 2 6										Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)																														D. PSD (Air Emissions from Proposed Sources)																													
MI 0038172																														9 P																													
B. UIC (Underground Injection of Fluids)																														E. OTHER (specify)																													
U																														MI 0039438 (specify) Construction (NPDES)																													
C. RCRA (Hazardous Wastes)																														E. OTHER (specify)																													
R																														412-76 (specify) State of Michigan Air Permit to Install																													

MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

NATURE OF BUSINESS (provide a brief description)

Electric Generation Station -- two 667 MW coal-fired units, both units have electrostatic precipitators.

I. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)																														B. SIGNATURE																														C. DATE SIGNED																													
J.M. Heidel																														C.M. Heidel																														11-17-80																													
EXECUTIVE Vice President																																																																																									

COMMENTS FOR OFFICIAL USE ONLY

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Please print or type in the unshaded areas only
if fill-in areas are spaced for elite type, i.e.,

characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER F
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FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)		2. NEW FACILITY (Complete item below.)			
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)		<input type="checkbox"/>			
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)		FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN			
YR.	MO.	DAY	YR.	MO.	DAY
8	7	12			
73	74	75	73	74	75
B. REVISED APPLICATION (place an "X" below and complete Item I above)			2. FACILITY HAS A RCRA PERMIT		
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS			<input type="checkbox"/>		

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-Feet	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP									
1									
13 14 15									
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEA- SURE (enter code)				1. AMOUNT	2. UNIT OF MEA- SURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 4	1,000,000	G		7				
2	S 0 4	16,300,000	G		8				
3	T 0 2	1,152,000	U		9				
4	T 0 4	27,000	U		10				
16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32									

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Thermal treatment at a design rate of 455 GPM.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. X-Z	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing. You have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

BR
245

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W										W									
T/A C										T/A C									
1										2 DUP									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																			
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES															
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))											
1	D 0 0 2	6,000	T	S 0 2	T 0 2														
2	D 0 0 2	1,700	T	S 0 2	T 0 4														
3	D 0 0 6	300	T	T 0 4															
4	D 0 0 8										Included with above								
5																			
6																			
7																			
8																			
9																			
10																			
11																			
12																			
13																			
14																			
15																			
16																			
17																			
18																			
19																			
20																			
21																			
22																			
23																			
24																			
25																			
26																			

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)															
S												T/A	C		
F													6		
1	2										13	14	15		

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

LATITUDE (*degrees, minutes, & seconds*)

4	2	4	6	2	6
65	66	67	68	69	70

LONGITUDE (*degrees, minutes, & seconds*)

	8	2		2	9		4	5	
72	-	74		75	76		77	-	79

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

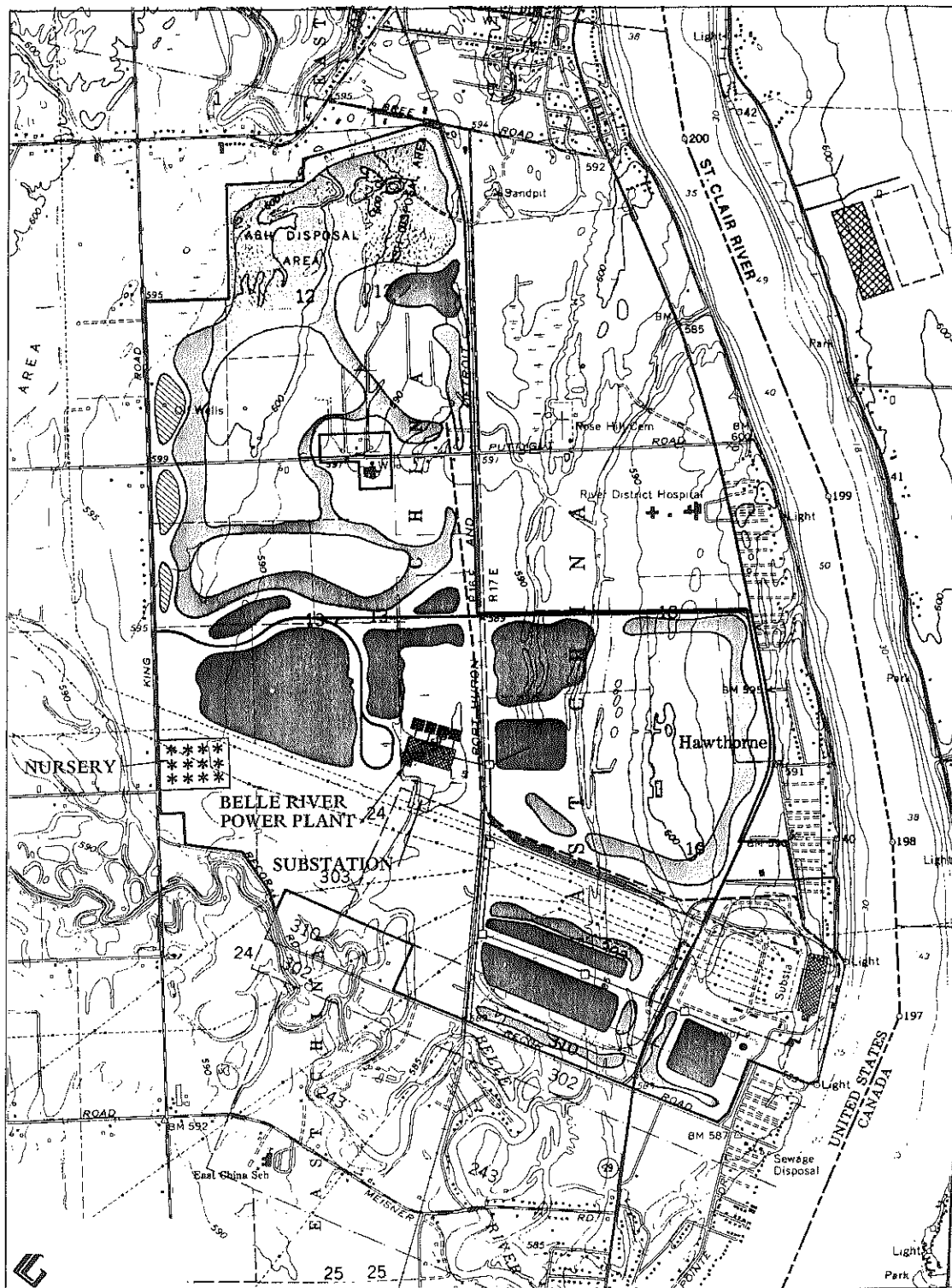
1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)										
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> C E </div> <div style="border-bottom: 1px solid black; height: 20px;"></div> </div>															<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> </div> <div style="border-bottom: 1px solid black; height: 20px;"></div> </div>										
13 14 - 15 16															88 86 - 89 89 - 91 92 - 93										
3. STREET OR P.O. BOX										4. CITY OR TOWN										5. ST.		6. ZIP CODE			
<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> C F </div> <div style="border-bottom: 1px solid black; height: 20px;"></div> </div>										<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> C G </div> <div style="border-bottom: 1px solid black; height: 20px;"></div> </div>										<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> </div> <div style="border-bottom: 1px solid black; height: 20px;"></div> </div>		<div style="border: 1px solid black; padding: 2px;"> <div style="display: flex; justify-content: space-between;"> </div> <div style="border-bottom: 1px solid black; height: 20px;"></div> </div>			
13 14 - 45 45 15 16										40 41 42										47 - 51					












I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
C. M. Heidel	C. M. Heidel	11-17-80

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
-------------------------	--------------	----------------



-  Landscaped Mounds & Reclaimed Areas
-  Preserved Woodland
-  Undeveloped Open Space
-  Future Fly Ash Disposal
-  Coal Storage Areas
-  Proposed Accessory Development
-  Existing Power Generation Facilities
-  Access Road
-  Service Road
-  Coal Conveyor
-  Transmission Lines

0 1/2 1 MILE



figure 5.1
LAND USE PLAN

BASE MAP SOURCE: U.S.G.S. (1968) St. Clair, Michigan

24/5

1. # MID 000 718 841

Facility Name Belle River Power Plant

☐

ACKNOWLEDGEMENT SENT

Reviewer Greg Weber

INTERNAL CHECKLIST

Review Started 9-11-81

1. Interim Regulatory Requirements

A. (1) FORM 1 MISSING

☐

(2) FORM 3 MISSING

☐

B. POSTMARK after NOVEMBER 19, 1980

☐

Valid

C. (1) DATE of OPERATION MISSING

☐

(2) DATE of OPERATION after NOVEMBER 19, 1980

☐

D. (1) NOTIFIED after AUGUST 18, 1980

☐

Valid

(2) NONNOTIFIER

☐

E. (1) FORM 1, XIII B SIGNATURE MISSING

☐

(2) FORM 3, IX B SIGNATURE MISSING

☐

2. A. TSDF

☐

B. NONREGULATED

☐

C. UNSURE

☐

D. UNKNOWN FACILITY

☐

(missing name and address on Form 3)

E. NEW FACILITY

☐

F. CORE ITEM(S) MISSING

☒

G. NONCORE ITEM(S) MISSING

☒

H. OTHER

☐

RECORD OF
COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE

☐ OTHER (SPECIFY)

(Record of item checked above)

TO:

FROM:

DATE

TIME

SUBJECT

Facility I.D.# / Facility Name

SUMMARY OF COMMUNICATION

CONCLUSIONS, ACTION TAKEN OR REQUIRED

FORMATION COPIES

ITEM NUMBER

CHECK IF ITEM
MISSINGII. Pollutant Characteristics ☐*III. Name of Facility ☐IV. Facility Contact ☐

V. Facility Mailing Address

A. Street or P.O. Box ☐B. City or Town ☐C. State ☐D. Zip Code ☐

VI. Facility Location

*A. Street, Route Number ☐B. County Name ☐*C. City or Town ☐*D. State ☐E. Zip Code ☐F. County Code (if known) ☐VII. SIC Codes (other than Process and Hazardous Waste codes) ☐

VIII. Operator Information

*A. Name ☐*B. Is the name listed in VIII-A also the owner ☐C. Status of operator ☐D. Phone ☐*E. Street or P.O. Box ☐*F. City or Town ☐*G. State ☐H. Zip Code ☐I.D.# MD 000 781 841Reviewer's Initial GW

IX. Indian Land ☐X. Existing Environmental Permits ☐XI. Map ☐XII. Nature of Business ☐

XIII. Certification

A. *1. Name ☐2. Official Title ☐*B. Signature ☐*C. Date Signed ☐

Comments:

*Form 1 is missing ☐

I.D.#

MID 000 71884

Reviewer's Initial

GR

FORM 3 (EPA FORM 3510-3)

ITEM NUMBER

CHECK IF ITEM
MISSING

II. First Application

*1. Existing Facility Date (on or before
November 19, 1980)

☒

OR

*2. New Facility Date (after November 19, 1980)

☐

III. Processes

*A. Process Code

☐

*B. Process Design Capacity-Amount

*1. Amount

*2. Unit of Measure *wrong unit for: 104*

☒

IV. Description of Hazardous Wastes

*A. EPA Hazardous Waste Number

☐

*B. Estimated Annual Quantity

☐

*C. Unit of Measure

☒

*D. Processes

*1. Process Codes

☐

*2. Process Description (If no code is shown)

☐

V. Facility Drawing

☒

VI. Photographs

☐

VII. Facility Geographic Location Latitude

Latitude

☐

Longitude

☐

I.D.# MD 000 781 841

Reviewer's Initial du

CHECK IF ITEM
MISSING

VIII. Facility Owner

- *1. Name of Facility's Legal Owner
- 2. Phone
- *3. Street or P.O. Box
- *4. City or Town
- *5. State
- 6. Zip Code

IX. Owner Certification

- *A. Name
- *B. Signature
- *C. Date Signed

X. Operator Certification

- *A. Name
- *B. Signature
- *C. Date

Comments:

*Form 3 is missing

--

.D.# MD000718841Reviewer's Initial EW

ID Number: MID00091884/ Inst Name Belie River Power PlantPHASE ONE

Refer to Form No:	Interim Regulatory Requirements	Indicate by your initials:		Valid Prm'l Date?
		Yes	No	
1	T/S/D Facility? (If No, return to respondent.)	R.P.		
3	Form 1 received?	R.P.		
1	Form 3 received?	R.P.		
1 & 3	Postmarked on or before November 19, 1980?	R.P.		
3	Date of operation entered?		R.P.	
3	Date of operation on or before November 19, 1980?		R.P.	
Notif. record	Notifier?	S.T.		
"	Notified on or before August 18, 1980?	S.T.		
1	Form 1, XIII B signed?	R.P.		
3	Form 3, IX B Signed?	R.P.		

(If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgement and indicate the trigger date here: _____)

PHASE TWO

1	Unsure if regulated or non-regulated?		
3	New facility?		
1 & 3	Core items missing? If Yes, indicate which items: Facility name____; location____; mail address____; operator info____; certification____; process info____; waste info____; owner____; sigs____.		

PHASE THREE

1 & 3	Non-core items missing? If Yes, indicate which items: Maps____; photos____; drawings____; lat/long____. Other observations and comments:
-------	--

Received Date Stamp

(Stamp forms also)

Log out/Log in
on reverse side.

MID 000 718 841

Utility Name Belle River Power Plant

☐ ACKNOWLEDGEMENT SENT

Reviewer Greg Weber ^{Becky Strom} INTERNAL CHECKLIST

Review Started 9-11-81 12/10/81

1. Interim Regulatory Requirements

A. (1) FORM 1 MISSING

☐

(2) FORM 3 MISSING

☐

B. POSTMARK after NOVEMBER 19, 1980

☐

Valid

C. (1) DATE of OPERATION MISSING

☐

(2) DATE of OPERATION after NOVEMBER 19, 1980

☐

D. (1) NOTIFIED after AUGUST 18, 1980

☐

Valid

(2) NONNOTIFIER

☐

E. (1) FORM 1, XIII B SIGNATURE MISSING

☐

(2) FORM 3, IX B SIGNATURE MISSING

☐

2. A. TSDF

B. NONREGULATED

C. UNSURE

D. UNKNOWN FACILITY
(missing name and address on Form 3)

E. NEW FACILITY

F. CORE ITEM(S) MISSING See following sheets for

G. NONCORE ITEM(S) MISSING which items are

H. OTHER

☐

☒

☐

☐

☐

☒

☒

☐

12/4/81

RECORD OF COMMUNICATION

☐ OTHER (SPECIFY)

(Record of ☐ checked above)

TO:

FROM:

DATE

Mr. Sterling

Becky Stron.

12/10/81

TIME

SUBJECT

ME 000718841

Facility I.D.#/Facility Name Belle River Power Plant

SUMMARY OF COMMUNICATION

12/10/81 - Mr. Sterling (313) 237-8618 - SO2 on HW code

AND NOT ON PROCESS code - Missing information returned

12/4/81 - Original sent back - OK except for codes

12/10/81 - Talked with Mr. E. Day will give correction on process code - he will call back.

12/11/81 - Mr. Cozino called me back 11:00 AM - He gave me SO2 process code and amount

Review is complete

CONCLUSIONS, ACTION TAKEN OR REQUIRED

Sent to Key Punch:
12/11/81

INFORMATION COPIES

TO:

FORM 1 (EPA FORM 3510-1)

ITEM NUMBER

CHECK IF ITEM
MISSING

II. Pollutant Characteristics

☐

*III. Name of Facility

☐

IV. Facility Contact

☐

V. Facility Mailing Address

A. Street or P.O. Box

☐

B. City or Town

☐

C. State

☐

D. Zip Code

☐

VI. Facility Location

*A. Street, Route Number

☐

B. County Name

☐

*C. City or Town

☐

*D. State

☐

E. Zip Code

☐

F. County Code (if known)

☐

VII. SIC Codes (other than Process and Hazardous Waste codes)

☐

VIII. Operator Information

*A. Name

☐

*B. Is the name listed in VIII-A also the owner

☐

C. Status of operator

☐

D. Phone

☐

*E. Street or P.O. Box

☐

*F. City or Town

☐

*G. State

☐

H. Zip Code

☐

M10 000 781 841

Reviewer's Initial

BS
GHT

IX. Indian Land

X. Existing Environmental Permits

XI. Map

XII. Nature of Business

XIII. Certification

A. *1. Name

2. Official Title

*B. Signature

*C. Date Signed

Comments:

*Form 1 is missing

D.#

MID 000 71884

Reviewer's Initial

BS
BS

ITEM NUMBER

CHECK IF ITEM
MISSING

II. First Application

- *1. Existing Facility Date (on or before
November 19, 1980) *Enter the date hazardous waste*
OR *operations began.* ☒
- *2. New Facility Date (after November 19, 1980). ☐

III. Processes

- *A. Process Code ☐
- *B. Process Design Capacity-Amount ☐

*1. Amount

*2. Unit of Measure *wrong unit for: 104*
See instructions on that page. ☒

IV. Description of Hazardous Wastes

*A. EPA Hazardous Waste Number ☐*B. Estimated Annual Quantity ☐*C. Unit of Measure - *for #3; D006* ☒*D. Processes ☐*1. Process Codes ☐*2. Process Description (If no code is shown) ☐V. Facility Drawing - *should be approximately to scale* ☒VI. Photographs ☐

VII. Facility Geographic Location Latitude

Latitude ☐Longitude ☐I.D.# MID 000 781 841Reviewer's Initial BS

CHECK IF THE
MISSING

VIII. Facility Owner

- *1. Name of Facility's Legal Owner
- 2. Phone
- *3. Street or P.O. Box
- *4. City or Town
- *5. State
- 6. Zip Code

☐
☐
☐
☐
☐
☐

IX. Owner Certification

- *A. Name
- *B. Signature
- *C. Date Signed

☐
☐
☐

X. Operator Certification

- *A. Name
- *B. Signature
- *C. Date

☐
☐
☐

Comments:

*Form 3 is missing

☐I.D.# M1D000718841

Reviewer's Initial

AS

**Detroit
Edison**

2000 Second Avenue
Detroit, Michigan 48226
(313) 237-8000

November 13, 1981

RECEIVED
NOV 17 1981

WASTE MANAGEMENT BRANCH
REGION V

MID0027 1884/ 12-9-81


Environmental Protection Agency
230 South Dearborn Street
Region V
Chicago, Illinois 60604

Attention: Mr. Grey Weber

Dear Mr. Weber:

Attached are Hazardous Waste Permit Applications which were returned to Detroit Edison from your office for having missing or incorrect information. The proper corrections have been made to the applications as requested by your department.

Sincerely,



Paul J. Eisele, Administrator
Water and Land Use Programs
Environmental Affairs Dept.

JC/aj

Attachments

RECEIVED
12/4/81



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

OCT 22 1981

18b, 62 100

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

OCT 13 1981

Belle River Power Plant
M. Sterling, Director
2000 Second Avenue
Detroit, MI 48226

RE: Hazardous Waste Permit Application-Incomplete Part A (MID000718841)
Facility Name (and EPA ID number)
Facility Address

We have completed our review of your Part A RCRA permit application for the facility referenced above. The application was incomplete; therefore, we are returning it to you along with a checklist which indicates the missing items. Please complete all missing items marked with an asterisk (*) on the application form, and return the form in time to reach this office by November 13, 1981. All other missing items marked on the checklist should be completed and may be forwarded to this office under separate cover by December 14, 1981.

All of these items are necessary in order for the U.S. Environmental Protection Agency to determine whether your facility qualifies for interim status. Once you receive interim status, your facility may continue operating under the interim status standards until such time as a Part B application is requested by USEPA. At that time, you will have up to six months to submit the Part B portion of the application and to show that you comply with the final detail technical standards.

Please note that some of your original entries on the forms may be changed. We have coded your forms to accommodate key punching for subsequent computer processing; all of our coding was done in blue ink only.

If you have any questions or wish to discuss the missing items on the checklist, please feel free to contact Greg Weber, the reviewer of your application, at (312) 886-3730 or me at (312) 886-7449.

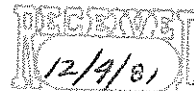
Sincerely yours,


Arthur S. Kawatachi
Regional Project Officer
JOE CAZENO, JR.

Enclosure

OCT 23 1981

P.S. All missing items marked with an asterisk must be submitted to us with a cover letter signed by the appropriate certifying official (Item XIII on Form 1 and/or Item IX and X on Form 3) or his duly authorized representative.



PLEASE NOTE

We have a new mailing address for all Region V RCRA activities.

RCRA ACTIVITIES

Region V

P.O. Box A3587

Chicago, Illinois 60690-3587

The following RCRA activities should be submitted to the address above:

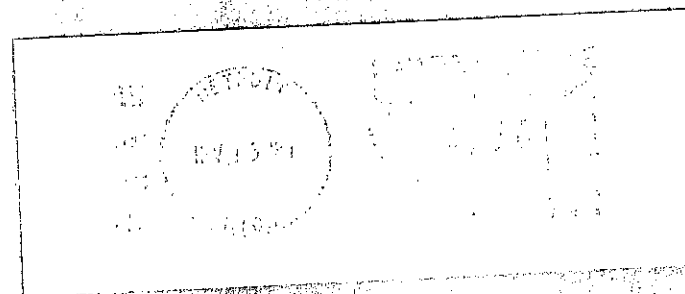
- a. Inquiries on ID numbers;
- b. Notification of Hazardous Waste Activity (EPA Form 8700-12);
- c. Part A of the RCRA treatment, storage, and/or disposal (TSD) facility permit application, Form 1 (EPA Form 3510-1) and Form 3 (EPA Form 3510-3);
- d. Part B of the RCRA TSD facility permit application;
- e. Manifest reports (exception, discrepancy and unmanifested waste);
- f. Financial responsibility documents; and
- g. Annual reports.

You can get information and answers to specific questions relating to Interim Status Standards and the Federal hazardous waste management program in your State by calling (312) 353-2197 and asking for RCRA hazardous waste regulations assistance. Region V has numerous technical staff who are available to help industry comply with the hazardous waste regulations under RCRA. Trained professionals provide accurate, up-to-date general information on the regulations and also answer questions regarding specific problems.

We have also designated State Implementation Officers (SIO) in the Regional Office who are responsible for coordinating the Federal and State efforts in the operation of the Federal hazardous waste management program. If you have questions on how the relationship between USEPA and State Agencies affect your operation, ask for the designated SIO when you call (312) 353-2197.

E DETROIT EDISON COMPANY

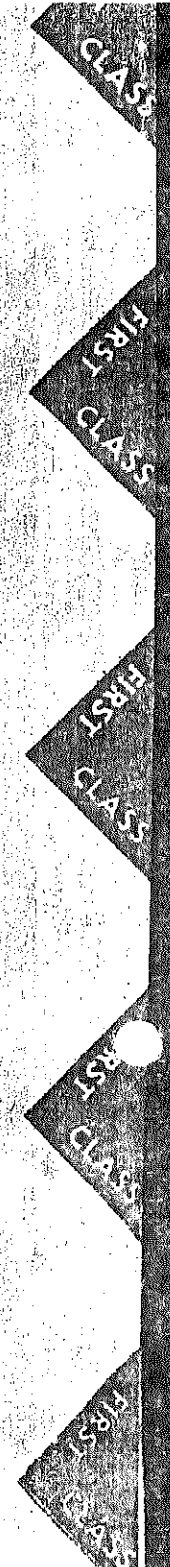
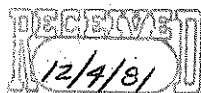
2000 SECOND AVENUE
DETROIT, MICHIGAN 48226



FIRST CLASS MAIL

Environmental Protection Agency
230 South Dearborn Street
Region V
Chicago, Illinois 60604

Attention: Mr. Grey Weber





UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

OCT 13 1981

Belle River Power Plant
M. Sterling, Director
2000 Second Avenue
Detroit, MI 48226

RE: Hazardous Waste Permit Application-Incomplete Part A (M1D000718841)
Facility Name (and EPA ID number)
Facility Address

We have completed our review of your Part A RCRA permit application for the facility referenced above. The application was incomplete; therefore, we are returning it to you along with a checklist which indicates the missing items. Please complete all missing items marked with an asterisk (*) on the application form, and return the form in time to reach this office by November 13, 1981. All other missing items marked on the checklist should be completed and may be forwarded to this office under separate cover by December 14, 1981.

All of these items are necessary in order for the U.S. Environmental Protection Agency to determine whether your facility qualifies for interim status. Once you receive interim status, your facility may continue operating under the interim status standards until such time as a Part B application is requested by USEPA. At that time, you will have up to six months to submit the Part B portion of the application and to show that you comply with the final detail technical standards.

Please note that some of your original entries on the forms may be changed. We have coded your forms to accommodate key punching for subsequent computer processing; all of our coding was done in blue ink only.

If you have any questions or wish to discuss the missing items on the checklist, please feel free to contact Greg Weber,
the reviewer of your application, at (312) 886-3730
or me at (312) 886-7449.

Sincerely yours,


Arthur S. Kawatachi
Regional Project Officer

Enclosure

P.S. All missing items marked with an asterisk must be submitted to us with a cover letter signed by the appropriate certifying official (Item XIII on Form 1 and/or Item IX and X on Form 3) or his duly authorized representative.

REGION V

DATE: 2/12/82

5MB

RE: Installation Name Detroit EdisonInstallation Address 2000 Second Ave - Detroit, MDEPA ID# See attached

FROM: Regulatory Analysis and Information Section

TO: Gene Meyer, Chief
Technical Programs Section

ATTN: Joe Bayle

Attached for your review is a copy of Letter requesting
that 9 facilities in Michigan be placed
on inactive status

for the above-referenced facility.

Cover letter date 1/26/82Rec'd in Region 2/12/82Rec'd in RAIS 2/12/82

Action required _____

Reviewer's summary: Refer to RAIU for whatever
action is needed to place these facilities' paperwork
and database info into "inactive status"
I believe RAIU has a roster of facilities which
want to get out of interim status
"non-regulated" for now. J. Bayle 2/22/82

PLEASE RETURN THIS FORM ALONG WITH ALL RELATED MATERIAL TO
DENISE BAKER

**Detroit
Edison**

2000 Second Avenue
Detroit, Michigan 48226
(313) 237-8000

January 26, 1982

RECEIVED

FEB 18 1982

**WASTE MANAGEMENT BRANCH
EPA, REGION V**

Mr. Joseph Boyle
RCRA Activities
P. O. Box 7861
Chicago, IL 60680

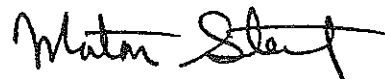
Dear Mr. Boyle:

The purpose of this letter is to request a change of status of the Detroit Edison Company's (the Company) treatment and storage permit applications under the Resource Conservation and Recovery Act (RCRA). The Company submitted requests for interim authorization under RCRA for nine power plants and one warehouse (the Warren Service Center, MI000722157) on November 18, 1980. Due to subsequent changes in RCRA regulations and interpretations, it appears that the activities at the power plants are exempted by rule. These provisions include the totally enclosed treatment exemption and the "fossil fuel exemption" 40 CFR 261.4(b)4, §288.6202 2(e). As a result, the Company requests that these nine applications (all except Warren Service Center) be placed in inactive status. I understand via our recent phone conversation that questions arise as to the status of power plant applications in light of the pending review of fly ash. Inactive status would assure a hiatus during the period of fly ash review and yet would provide you with information from submitted application forms. It would save the expense of reviewing applications for completeness and any audit functions. The Michigan Department of Natural Resources have concurred that the facilities do not require permits under the State Hazardous Waste Management Act (Act 64) at this time (see enclosed letter).

I have enclosed brief facility descriptions explaining process stream waste materials along with NPDES water use diagrams. These should clarify the Company interpretation by rule.

I ask that you place the following applications on inactive status until decisions are made regarding fly ash. If you have any questions or require clarification, please notify Dr. Paul Eisele of my staff (313 237-8618).

Sincerely,



Morton Sterling, Director
Environmental Affairs Department

Enclosures

cc: EPA Audit Division

E/bjw

RECEIVED
2/12/82

Introduction

On November 19, 1980 the Detroit Edison Company submitted Treatment and Storage Permit application forms under the federal Resource Conservation and Recovery Act (RCRA) for ten facilities, nine power plant sites and 1 service center. Three process waste streams were considered and reported for the power plants as possible "hazardous wastes." These were demineralizer regenerant and air preheater wash water as corrosive wastes and chelated boiler cleaning solutions because some metals sometimes exceeded certain levels.

Shortly after these applications were submitted, further testing, rule clarifications and interpretive memos clarified facts that excluded these wastes as hazardous or exempted them from further regulation. Further testing proved all preheater wash water to be non hazardous. Clarifications on totally enclosed treatment and treatment in self supporting impervious structures rendered demineralizer discharges exempt from regulation. Both of these waste streams are discharged, following treatment if necessary, via NPDES discharges.

The utility waste exemption described in the so-called EPA "Dietrich memorandum" for RCRA purposes can exempt metal cleaning wastes from regulation. These wastes, generated through chelant cleanings of the boiler tubes, are burned in operating boilers and/or are co-disposed with ashes.

The following descriptions and diagrams characterize present operating conditions at power plants on a site specific basis. Only demineralizer and metal cleaning waste handling will be described. Of these two waste streams, metal cleaning wastes are produced intermittently, approximately 12 times per year, Company wide. The cleanings occur once every 18 months to 5 years per boiler. Since the wastes are generated intermittently and may vary from plant to plant and boiler to boiler, not all cleanings have been characterized.

Belle River Power Plant - MID000718841 G, T, TSD, PA gmb

The Belle River Power Plant is a coal-fired two unit plant under construction. The plant is permitted to discharge metal cleaning wastes, demineralizer regenerate and condensate polisher regenerate under NPDES (see enclosed water diagram). Demineralizer and condensate polisher regenerates are neutralized in a totally enclosed treatment system prior to discharge. Metal cleaning is planned to be done periodically on the two boilers using ammoniated EDTA. The boilers would be cleaned individually with the waste stream routed directly to the operating boiler. The solution could be hazardous but it is unlikely since the boiler and associated equipment are not copper and the system would be new. The EDTA would be combusted and the metallic particulate matter would be removed with ash in the flue gas. This waste would thus be exempted under the RCRA rules as evidenced by the Dietrich letter.

River Rouge Power Plant - MID 000718 379 G, T, TSD, PA

The River Rouge Power Plant is a multi-unit plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system prior to discharge.

Metal cleaning is done periodically on the 2 operating boilers (1 unit is in economy reserve) using ammoniated EDTA. The boilers are cleaned individually with the waste stream routed directly to the operating boiler at a rate of 200 gpm. This solution could contain up to 2500 mg/l copper, 20 mg/l lead or 20 mg/l chromium based on reported analyses from similar boiler solutions.

This practice has been ongoing. This waste is exempted under the RCRA rules as evidenced by the Dietrich memo. Non-combustible metals are removed from the flue gas by the same equipment which is used to remove coal ash.

Conners Creek Power Plant - MID000809608 G, T, TSD *gmb* *no Part A*

The Conners Creek Power Plant is a multi-unit plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system.

Metal cleaning is done periodically on the 4 operating coal fired boilers (11 stoker fired boilers are on economy reserve and are not expected to require cleaning) using a chelant solution, ammoniated EDTA. Boilers are cleaned individually with the waste stream routed directly to an operating boiler for thermal treatment at a rate of 100 gallons per minute. This solution could contain up to 2500 mg/l copper, 20 mg/l lead and 20 mg/l chromium since these are older boilers, based on maximum analysis obtained from similar solutions. This practice has been ongoing. The chelant solution is combusted and the metallic particulate matter is removed with ash in the flue gas. This waste is thus exempted under the RCRA rules as evidenced by the Dietrich memo.

Trenton Channel Power Plant - MID000721571 G, T, TSD, PA *gmb*

The Trenton Channel Power Plant is a multi-unit coal fired plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system.

Metal cleaning is done periodically on the 5 existing boilers using a chelant solution, ammoniated EDTA. Boilers are cleaned individually and the waste stream is routed directly to an operating boiler at a rate of 240 gpm. This solution could contain up to 2500 mg/l copper, 20 mg/l lead or 20 mg/l chromium based on the maximum reported analyses of several cleaning solutions. This practice has been ongoing. The chelant solution is combusted and the metallic particulate matter removed with the other ash in the flue gas. This waste is thus exempted under the RCRA rules as evidenced by the Dietrich memo.

St. Clair Power Plant - MID000721548 G, T, TSD, PA *gmb*

The St. Clair Power Plant is a multi-unit plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system prior to discharge.

Metal cleaning is done periodically on the 6 coal fired boilers (the seventh boiler is on economy reserve) using a chelant solution, ammoniated EDTA. The boilers are cleaned individually with the waste stream routed directly to an operating boiler at a rate of 428 gpm. This solution could contain up to 2500 mg/l copper, 20 mg/l lead or 20 mg/l chromium based upon the maximum reported analyses of cleaning solutions. The EDTA is combusted and the metallic particulate matter removed with ash in the flue gas. This waste is thus exempted under the RCRA rules as evidenced by the Dietrich memo.

Harbor Beach Power Plant - MID000718445 G, T, TSD, PA

gmb
The Harbor Beach Power Plant is a single unit plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system prior to discharge.

Metal cleaning is done periodically on the one coal fired boiler using a chelant solution, ammoniated EDTA. Since there is only one boiler, the waste stream is routed to a tank truck and held until the unit is refired. The stream is then combusted at a rate of 86 gpm. This solution could contain up to 2500 mg/l copper, 20 mg/l lead or 20 mg/l chromium but it is unlikely since the boiler is newer. Since the chromium, copper and lead are removed and codisposed along with the ash in the flue gas, this waste stream is thus exempted under the RCRA rules as evidenced by the Dietrich memo.

Marysville Power Plant - MID041813098 G, T, TSD, PA

gmb
The Marysville Power Plant is a multi-unit plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system prior to discharge.

Metal cleaning is done periodically on the 4 operating coal fired boilers (6 stoker fired boilers are on economy reserve) using a chelant solution, ammoniated EDTA. The boilers are cleaned individually and the Company plans to route the waste stream directly to an operating boiler for thermal treatment at a rate of 63 gpm. This solution could contain up to 2500 mg/l copper, 20 mg/l lead or 20 mg/l chromium based upon the maximum reported concentration of analyzed solution. Since this a coal fired facility and the hazardous constituents would be removed with the plant's fly ash, this waste is exempted under the RCRA rules as evidenced by the Dietrich memo.

Greenwood Energy Center - MID000718452 G, T, TSD, PA

gmb
The Greenwood Power Plant is an oil fired single unit plant which is permitted to discharge condensate polisher demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer condensate polisher regenerant is neutralized in a self supporting impervious concrete tank prior to discharge to other wastewaters.

Metal cleaning is done periodically on the one boiler using a chelant solution, EDTA. Since the boiler is new, it is questionable whether the waste stream will exceed copper, chromium or lead limits. Cleanings are so rare that no cleaning waste was generated in the past year nor is any planned for the next 3 years. Company plans are to test the waste to determine if it is 'hazardous'. If it is 'hazardous', in-line lime treatment will be used to render it non-hazardous in a totally enclosed treatment system, and it will be either combusted or discharged via NPDES.

Monroe Power Plant - MID092175074 G, T, TSD, PA

gmb
No Act 64 permit application was submitted for the multi-unit coal fired Monroe Power Plant. Discharge of both the demineralizer regenerant condensate polisher and metal cleaning wastes (acid cleaning) are permitted under NPDES (see enclosed

water use diagram). Demineralizer and condensate polisher waste streams are neutralized in totally enclosed treatment systems. Previous tests on the acid metal cleaning wastes have indicated the waste is not hazardous.

Conclusion

Based on the site specific information above, demineralizer regenerant condensate polisher waste at all facilities is "non-hazardous waste" after totally enclosed treatment. Combustion and/or co-disposal of ammoniated EDTA is exempt at all power plants except the Greenwood Power Plant which is oil fired.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 13 1981

OFFICE OF WATER
AND WASTE MANAGEMENT

Mr. Paul Emler, Jr.
Chairman
Utility Solid Waste Activities
Group
Suite 700
1111 Nineteenth Street, N.W.
Washington, D.C. 20036

Dear Mr. Emler:

This is a response to your letter of October 10, 1980 to Administrator Costle, regarding the recent Solid Waste Disposal Act Amendments of 1980 and their relation to the electric utility industry. In your letter and its accompanying document, you discussed the specific amendments which address fossil fuel combustion wastes, and suggested interpretive language which EPA should adopt in carrying out the mandate of the amendments. You requested a meeting with our staff to make us more fully aware of the solid waste management practices of the electric utility industry, and to discuss the effect of the amendments on the utility solid waste study which EPA is currently conducting.

I appreciated the opportunity to meet with you, in your capacity as chairman of the Utility Solid Waste Activities Group (USWAG), on November 21 to discuss your concerns. I am taking this occasion to share with you the most recent EPA thinking on the exclusion from our hazardous waste management regulations of waste generated by the combustion of fossil fuels, and to confirm certain agreements which were reached during our meeting. The language contained in this letter should provide you and your constituents with an adequate interpretation of the fossil fuel combustion waste exclusion in Section 261.4(b)(4) of our regulations. This letter is also being circulated to appropriate Agency personnel, such as our Regional Directors of Enforcement, for their information and use. We intend to issue in the Federal Register an official Regulations Interpretation Memorandum reflecting the policies articulated in this letter.

In our May 19, 1980 hazardous waste management regulations, we published an exclusion from Subtitle C regulation for those fossil fuel combustion wastes which were the subject of then pending Congressional amendments. The language of that exclusion in §261.4(b)(4) of our May 19 regulations is identical to pertinent language of Section 7 of the Solid Waste Disposal Act

Amendments of 1980 (P.L. 96-482) which was enacted on October 21, 1980 and which mandates that exclusion. Specifically, the exclusion language of our regulations provides that the following ~~solid wastes are not hazardous wastes:~~

"Fly ash waste, bottom ash waste, slag waste, and flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels."

Residues from the Combustion of Fuel Mixtures

The first point which you raise in your letter and your "Proposed RIM Language" is the interpretation of the term "primarily" used in this exclusion language. EPA believes that Congress intended the term "primarily" to mean that the fossil fuel is the predominant fuel in the fuel mix, i.e., more than 50 percent of the fuel mix. (See Congressional Record, February 20, 1980, p. H1103, remarks of Congressman Horton and p. H1102, remarks of Congressman Bevill.) Therefore, EPA is interpreting the exclusion of §261.4(b)(4) to include fly ash, bottom ash, boiler slag and flue gas emission control wastes (hereinafter referred to as "combustion wastes") that are generated by the combustion of mixtures of fossil fuels and alternative fuels, provided that fossil fuels make up at least 50 percent of the fuel mix.

This interpretation begs the question of whether the exclusion also extends to combustion wastes that result from the burning of mixtures of fossil fuels and hazardous wastes. We have limited data which indicates that spent solvents listed in §261.31 of our regulations, certain distillation residues listed in §261.32, waste oils that may be hazardous wastes by virtue of characteristics or the mixture rule, and other hazardous wastes are often burned as supplemental fuels--sometimes in proportionally small amounts but sometimes in significant amounts (comprising 10 percent or more of the fuel mix ratio)--particularly in industrial boilers but sometimes in utility boilers. EPA is concerned about the human health and environmental effect of the burning of these hazardous wastes: both the effect of emissions into the atmosphere and the effect of combustion residuals that would be contained in the fly ash, bottom ash, boiler slag and flue gas emission control wastes.

We intend to address the first of these concerns in our future development of special requirements applicable to hazardous wastes that are beneficially used or legitimately recycled. In §261.6 of our May 19, 1980 regulations, we currently exempt from regulatory coverage hazardous wastes that are beneficially used or legitimately recycled, except that, where these wastes are listed as hazardous wastes or sludges, their storage or transportation prior to use or recycle is subject to our

regulations. We clearly explained in the preamble to Part 261 of our May 19 regulations that we fully intend to eventually regulate the use and recycling of hazardous wastes and, in doing so, would probably, in most cases, develop special requirements that provide adequate protection of human health and the environment without unwarranted discouragement of resource conservation. Consequently, although the burning of hazardous waste as a fuel (a beneficial use assuming that the waste has a positive fuel value) is not now subject to our regulations (except as noted above) it may well be subject to our regulation in the future.

Our second concern with combustion of fuel mixtures is the one at focus in this interpretation. It must first be noted that we do not intend for §261.6 to provide an exemption from regulation for combustion wastes resulting from the burning of hazardous wastes in combination with fossil fuels; it only provides an exemption for the actual burning of hazardous wastes for recovery of fuel value. Thus, if these combustion wastes are exempted from our regulation, such exemption must be found through interpretation of §261.4(b)(4). Secondly, we note that although the pertinent language in Section 7 of the Solid Waste Disposal Act Amendments of 1980 and the related legislative history on this matter speak of allowing the burning of alternative fuel without precisely defining or delineating the types of alternative fuel, the only examples of alternative fuels used in the legislative history are refuse derived fuels. Therefore, a literal reading of the legislative history might enable us to interpret the exclusion to include combustion wastes resulting from the burning of fossil fuels and other fuels, including hazardous wastes. However, since each of these legislative comments was made in the context of refuse derived fuels or other non-hazardous alternate fuels, we do not believe the Congressional intent compels us to make such an interpretation if we have reason to believe that such combustion wastes are hazardous.

Presently, we have little data on whether or to what extent combustion wastes are "contaminated" by the burning of fossil fuel/hazardous waste mixtures. The data we do have (e.g., burning of waste oils) suggests that the hazardous waste could contribute toxic heavy metal contaminants to such combustion wastes. When coal is the primary fuel, the amount of resulting contamination is probably in amounts that are not significantly different than the metals that would be contributed by the fossil fuel component of the fuel mixture. This may not be the case with oil and gas, where huge volumes of waste are not available to provide a dilution effect. We suspect that the other hazardous constituents of the hazardous wastes that typically would be burned as a fuel are either thermally destroyed or are emitted in the flue gas (and therefore are part of our first concern as discussed above). If

these data and this presumption are true, then combustion wastes resulting from the burning of coal/hazardous waste mixtures should not be significantly different in composition than combustion wastes generated by the burning of coal alone. Because the Congress has seen fit to exclude the latter wastes from Subtitle C, pending more study, we feel compelled to provide the same exclusion to the former wastes.

Accordingly, we will interpret the exclusion of §261.4(b)(4) to include fly ash, bottom ash, boiler slag and flue gas emission control wastes generated in the combustion of coal/hazardous waste mixtures provided that coal makes up more than 50 percent of the fuel mixture.

We offer this interpretation with great reluctance and with the clear understanding it is subject to change, if and when data indicate that combustion wastes are significantly contaminated by the burning of hazardous wastes as fuel. We also offer this interpretation with the understanding, as discussed at our meeting of November 21, that the utility industry will work with us over the next several months to improve our data on this matter. We believe it is essential that we make a more informed judgement and possible reconsideration of our interpretation of the exclusion as soon as possible and before completion of our longer-term study of utility waste which is proceeding. Accordingly, we would like you to provide to us all available data on the following questions by August 1, 1981:

1. What types of hazardous wastes are commonly burned as fuels in utility boilers? In what quantity? In what ratio to fossil fuels? How often? What is their BTU content?
2. Does the burning of these wastes contribute hazardous constituents (see Appendix VIII of Part 261 of our regulations) to any of the combustion wastes? If so, what constituents, and in what amounts? How does the composition of combustion wastes change when hazardous wastes are burned?

Co-disposal and Co-treatment

The second issue raised in your letter was whether the exclusion extends to wastes produced in conjunction with the burning of fossil fuels which are co-disposed or co-treated with fly ash, bottom ash, boiler slag and flue gas emission control wastes. As examples of such wastes, you specifically mention boiler cleaning solutions, boiler blowdown, demineralizer regenerant, pyrites, cooling tower blowdown, or any "wastes of power plant origin whose co-treatment with fly ash, bottom ash, slag and flue gas emission control sludges is regulated under State-or-EPA-sanctioned management or treatment plans."

The legislative history on this matter clearly indicates that the Congress intended that these other wastes be exempted from Subtitle C regulation provided that they are mixed with and co-disposed or co-treated with the combustion wastes and further provided that "there is no evidence of any substantial environmental danger from these mixtures." (See Congressional Record, February 20, 1980, p. H 1102, remarks of Congressman Beville; also see remarks of Congressman Rahall, Congressional Record, February 20, 1980, p. H1104.) .

We have very little data on the composition, character and quantity of these other associated wastes (those cited above), but the data we do have suggest that they are generated in small quantities relative to combustion wastes, at least when coal is the fuel, and that they primarily contain the same heavy metal contaminants as the combustion wastes, although they may have a significantly different pH than the combustion wastes. These limited data therefore suggest that, when these other wastes are mixed with and co-disposed or co-treated with the much larger quantities of combustion wastes, their composition and character are "masked" by the composition and character of the combustion wastes; that is, they do not significantly alter the hazardous character, if any, of the combustion wastes.

Given this information base and given the absence of definitive information indicating that these other wastes do pose a "substantial danger" to human health or the environment, we believe it is appropriate, in the light of Congressional intent, to interpret the §261.4(b)(4) exclusion to include other wastes that are generated in conjunction with the burning of fossil fuels and mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag and flue gas emission control wastes.

We offer this interpretation with some reluctance because it is made in the absence of definitive information about the hazardous properties of these other wastes or their mixtures with combustion wastes. We therefore believe it is imperative that we proceed to collect all available data on this matter within the next several months and reconsider this interpretation when these data are assessed. Toward that end and consistent with the discussion at our meeting of November 21, we are asking that you assist us in collecting these data. Specifically, we ask that you collect and submit by August 1, 1981, any available data on the following questions:

1. What are the "other" wastes which are commonly mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag or flue gas emission control wastes? What are their physical (e.g., sludge or liquid) and chemical properties? Are they hazardous wastes in accordance with Part 261?

2. What are the co-disposal or co-treatment methods employed?
3. How often are these wastes generated? In what quantities are they generated? ~~Are they commonly treated in any way before being co-disposed?~~
4. Does the industry possess any data on the environmental effects of co-disposing of these wastes? Groundwater monitoring data? What are the results?

The interpretation on other associated wastes provided in this letter is limited to wastes that are generated in conjunction with the burning of fossil fuels. We do not intend to exempt hazardous wastes that are generated by activities that are not directly associated with fossil fuel combustion, steam generation or water cooling processes. Thus, for example, the §261.4(b)(4) exclusion does not cover pesticides or herbicide wastes; spent solvents, waste oils or other wastes that might be generated in construction or maintenance activities typically carried out at utility and industrial plants; or any of the commercial chemicals listed in §261.33 which are discarded or intended to be discarded and therefore are hazardous wastes. Further, the exclusion does not cover any of the hazardous wastes listed in §§261.31 or 261.32 of our regulations. None of these listed wastes were mentioned in your letter or our discussions.

The interpretation on other wastes is also limited to wastes that traditionally have been and which actually are mixed with and co-disposed or co-treated with combustion wastes. If any of these other wastes (e.g., boiler cleaning solutions, boiler blowdown, demineralizer regenerant, pyrites and cooling tower blowdown) are segregated and disposed of or treated separately from combustion wastes and they are hazardous wastes, they are not covered by the exclusion. In the same vein, the exclusion does not cover other wastes where there are no combustion wastes (or relatively small amounts of combustion wastes) with which they might be mixed and co-disposed or co-treated--a situation which might prevail where natural gas or oil is the principal fossil fuel being used. Therefore, this interpretation of the exclusion applies only where coal is the primary fuel. We feel this is a legitimate interpretation of Congressional intent, wherein the argument of little potential environmental hazard, primarily due to the dilution factor, is clearly based upon co-disposal or co-treatment with the huge volumes of wastes generated during coal combustion.

EPA Utility Waste Study

The groups of questions raised above bring us to the final subject which you address concerning the study of utility solid waste management which EPA is conducting. We agree that the study, as currently being conducted, does not focus on the matters discussed in this letter. We would, however, like to address these matters and include them in our report to Congress, to the extent possible. To accomplish this, we plan to meet in the very near future with our contractor, Arthur D. Little, Inc., to discuss what studies may need to be carried out in addition to their currently planned activities under the contract. The inputs of your organization could be quite useful in this effort. It may be impossible, however, to modify our present study to include a detailed investigation of all of the issues discussed above.

Notwithstanding, we would like to address the matters discussed in this letter within a shorter time frame--during the next six months. Based on our meeting of November 21, it is my understanding that the utility industry, working closely with EPA, is willing to develop data on the questions put forth above. We agreed that, as a first step, USWAG will prepare a study outline designed to obtain these data. EPA staff and industry representatives designated by your organization will then mutually review the information needs. The data collection effort will then follow. Finally, data and analyses will be presented to EPA for review. This will enable us to reconsider the interpretation provided in this letter and make any changes deemed necessary. Therefore, I would appreciate it if you would designate a technical representative as USWAG's contact person for this coordinated data collection effort.

In the meantime, and pending completion of this effort, EPA will interpret 40 CFR §261.4(b)(4) to mean that the following solid wastes are not hazardous wastes:

- (a) Fly ash, bottom ash, boiler slag and flue gas emission control wastes resulting from (1) the combustion solely of coal, oil, or natural gas, (2) the combustion of any mixture of these fossil fuels, or (3) the combustion of any mixture of coal and other fuels, up to a 50 percent mixture of such other fuels.
- (b) Wastes produced in conjunction with the combustion of fossil fuels, which are necessarily associated with the production of energy, and which traditionally have been, and which actually are, mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag, or flue gas emission control wastes from coal combustion.

This provision includes, but is not limited to, the following wastes:

- (1) boiler cleaning solutions,
- ~~(2) boiler blowdown,~~
- (3) demineralizer regenerant,
- (4) pyrites, and
- (5) cooling tower blowdown.

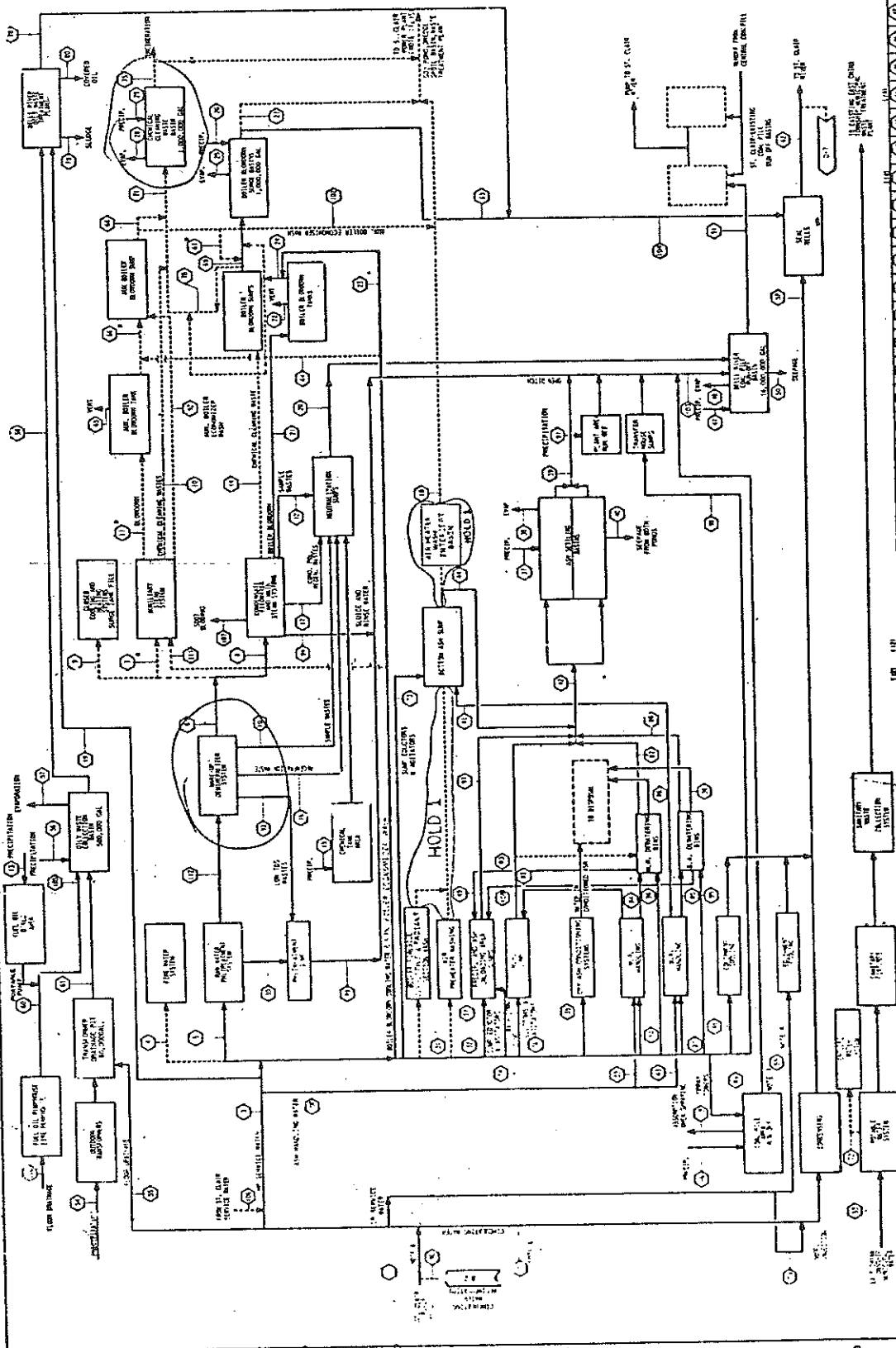
I am hopeful that our future research activities together will prove fruitful and that these issues can be rapidly resolved. I have designated Ms. Penelope Hansen of my staff as the EPA point of contact for this effort. You may reach her at (202) 755-9206.

Sincerely yours,



Gary N. Dietrich
Associate Deputy Assistant Administrator
for Solid Waste

Belle Four. PP
Water Lilies

[illegible]

SILVER

1. The first step in the process of the investigation is to determine the scope of the problem. This involves identifying the specific areas of concern and the potential causes of the problem.

2. The second step is to gather information. This involves collecting data from various sources, including interviews with staff, review of records, and observation of the work environment.

3. The third step is to analyze the information. This involves identifying patterns, trends, and potential causes of the problem. This step may involve the use of statistical analysis or other data analysis techniques.

4. The fourth step is to develop a plan of action. This involves identifying the specific steps that need to be taken to address the problem and the resources that will be required to implement the plan.

5. The fifth step is to implement the plan. This involves putting the plan into action and monitoring the progress of the investigation.

6. The sixth step is to evaluate the results. This involves assessing the effectiveness of the investigation and the impact of the plan of action.

7. The seventh step is to report the findings. This involves preparing a report that summarizes the findings of the investigation and the recommendations for action.

8. The eighth step is to follow up. This involves monitoring the progress of the implementation of the plan of action and ensuring that the problem is resolved.

9. The ninth step is to review the process. This involves evaluating the effectiveness of the investigation process and making any necessary adjustments.

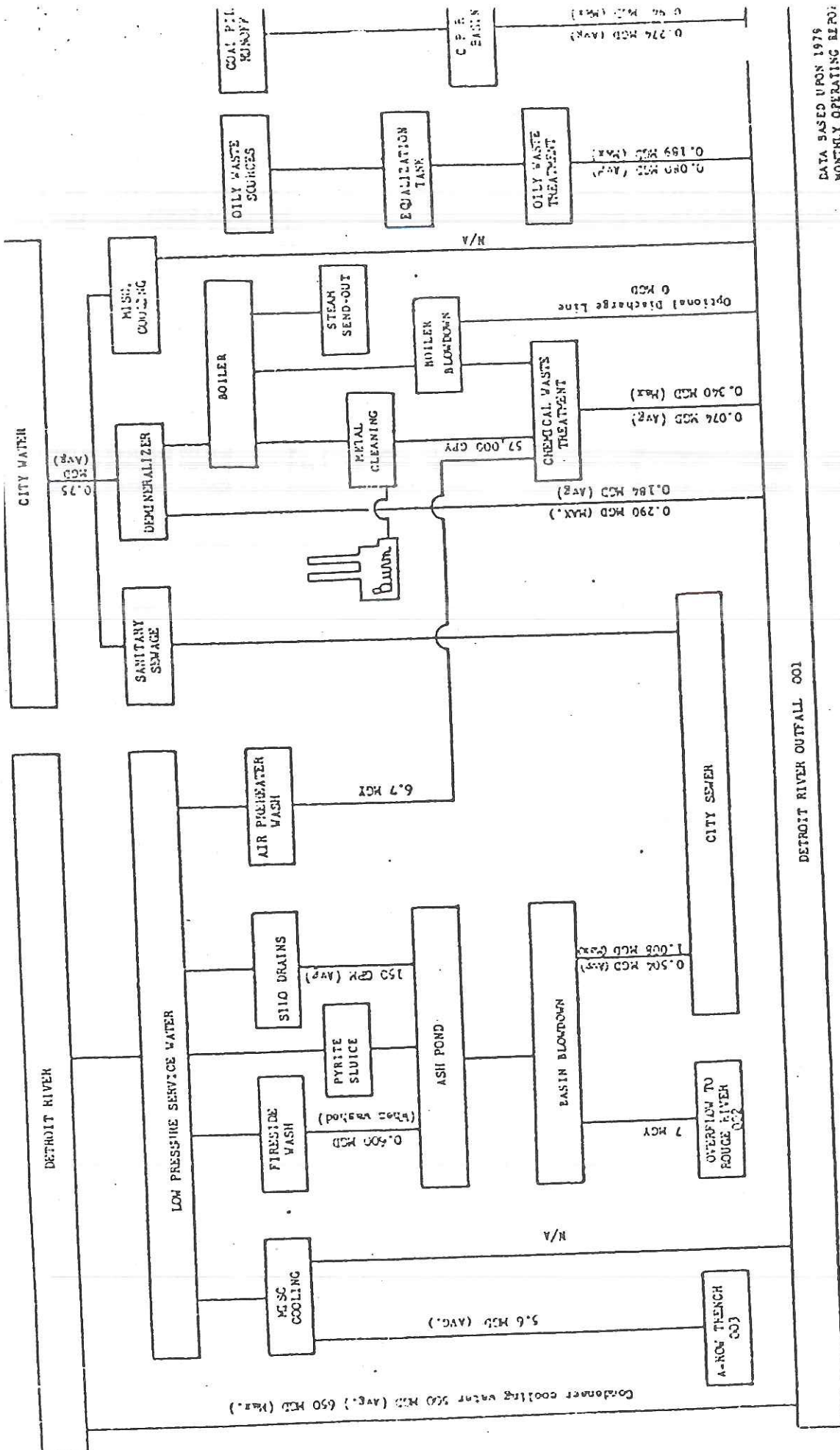
10. The tenth step is to disseminate the findings. This involves sharing the findings of the investigation with the relevant stakeholders.

FD-256-0046

44-38861-10539 FD-004 (Rev. 1-25-60)
JAMES EARL RAYSON CO.

WATER USE DIAGRAM

6F01258-0048

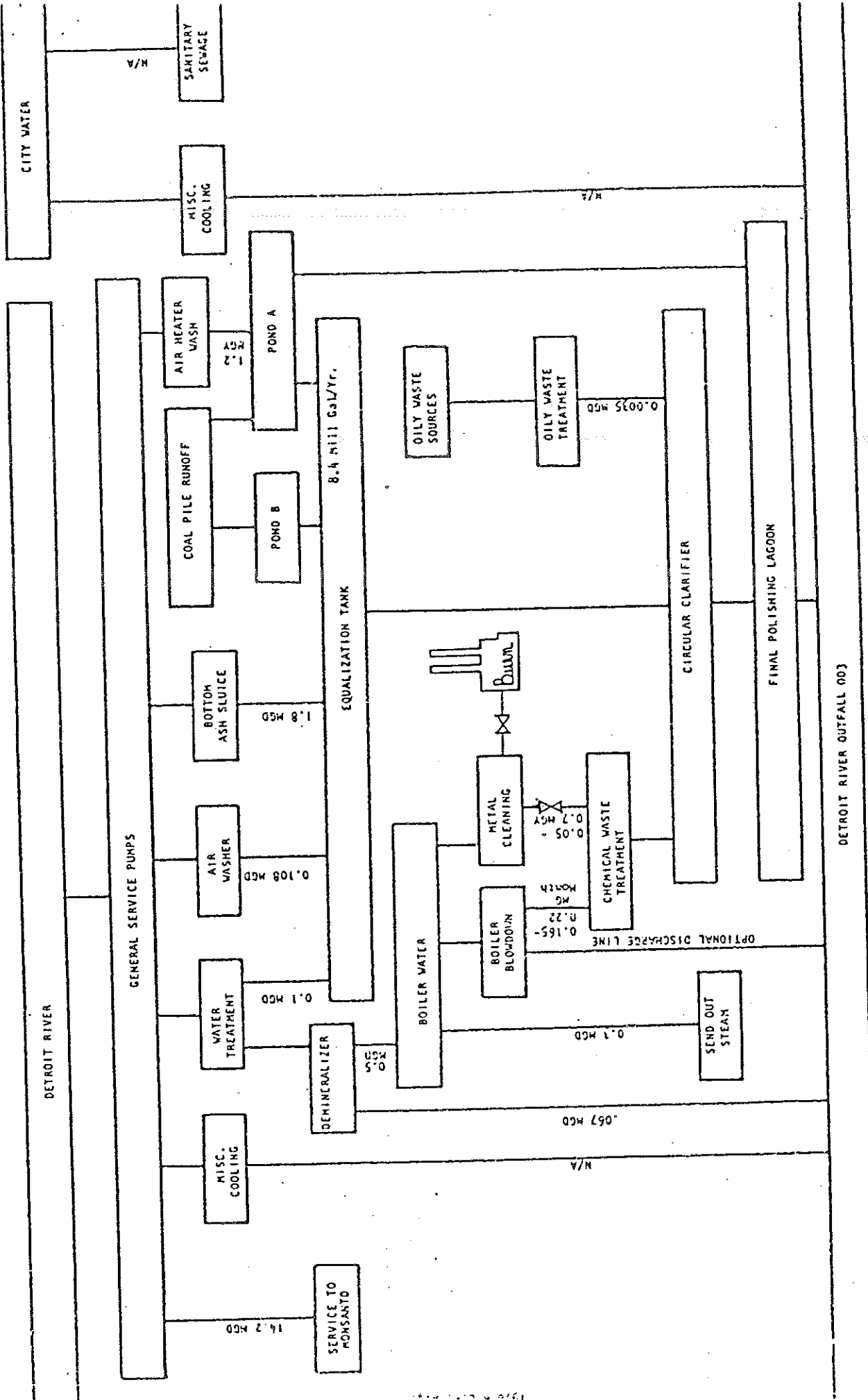


DATA BASED UPON 1979
MONTHLY OPERATING REPORT

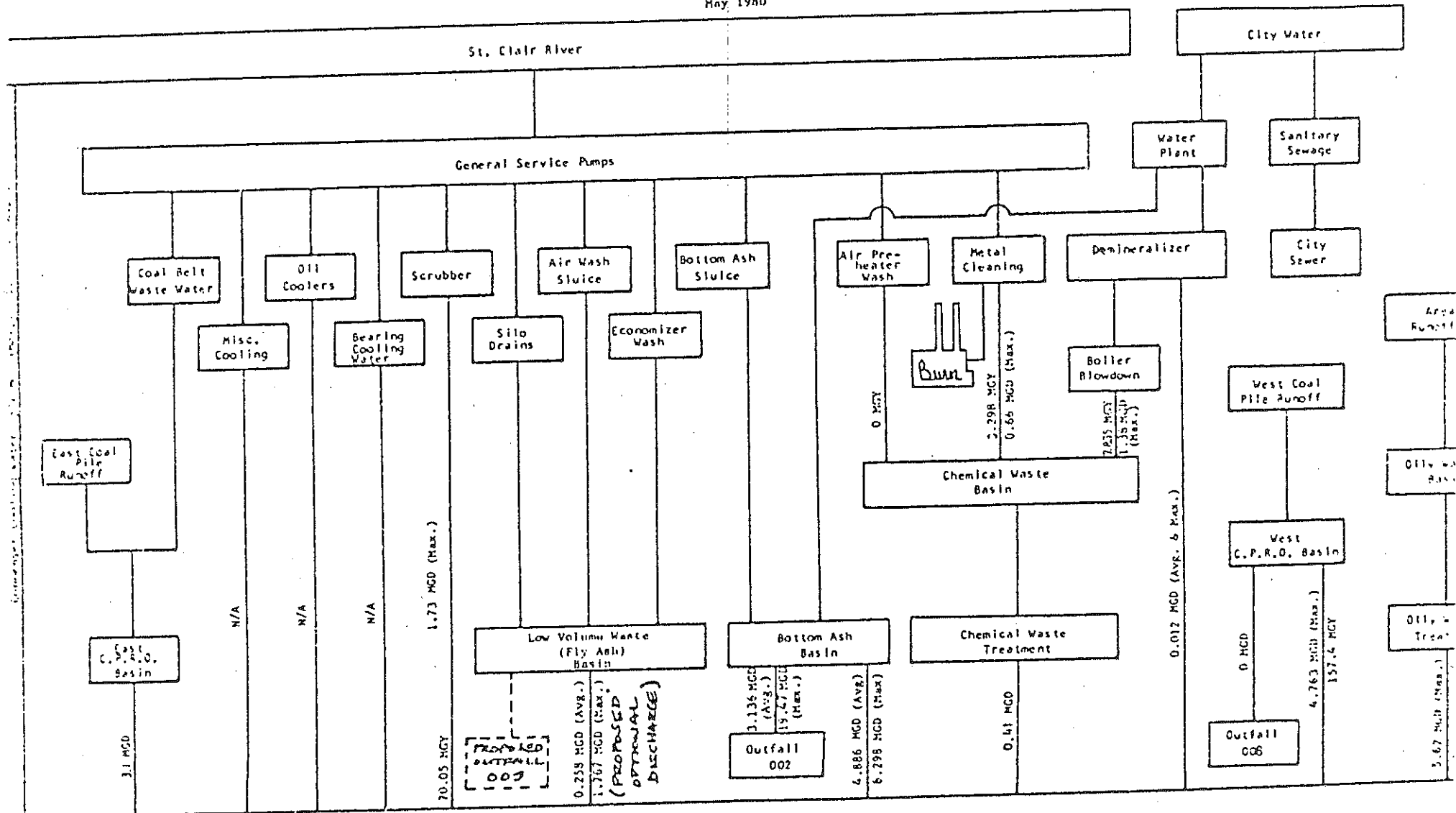
TRENTON CHANNEL POWER PLANT

Water Usage

August 1975



ST. CLAIR POWER PLANT
Water Usage
May, 1980



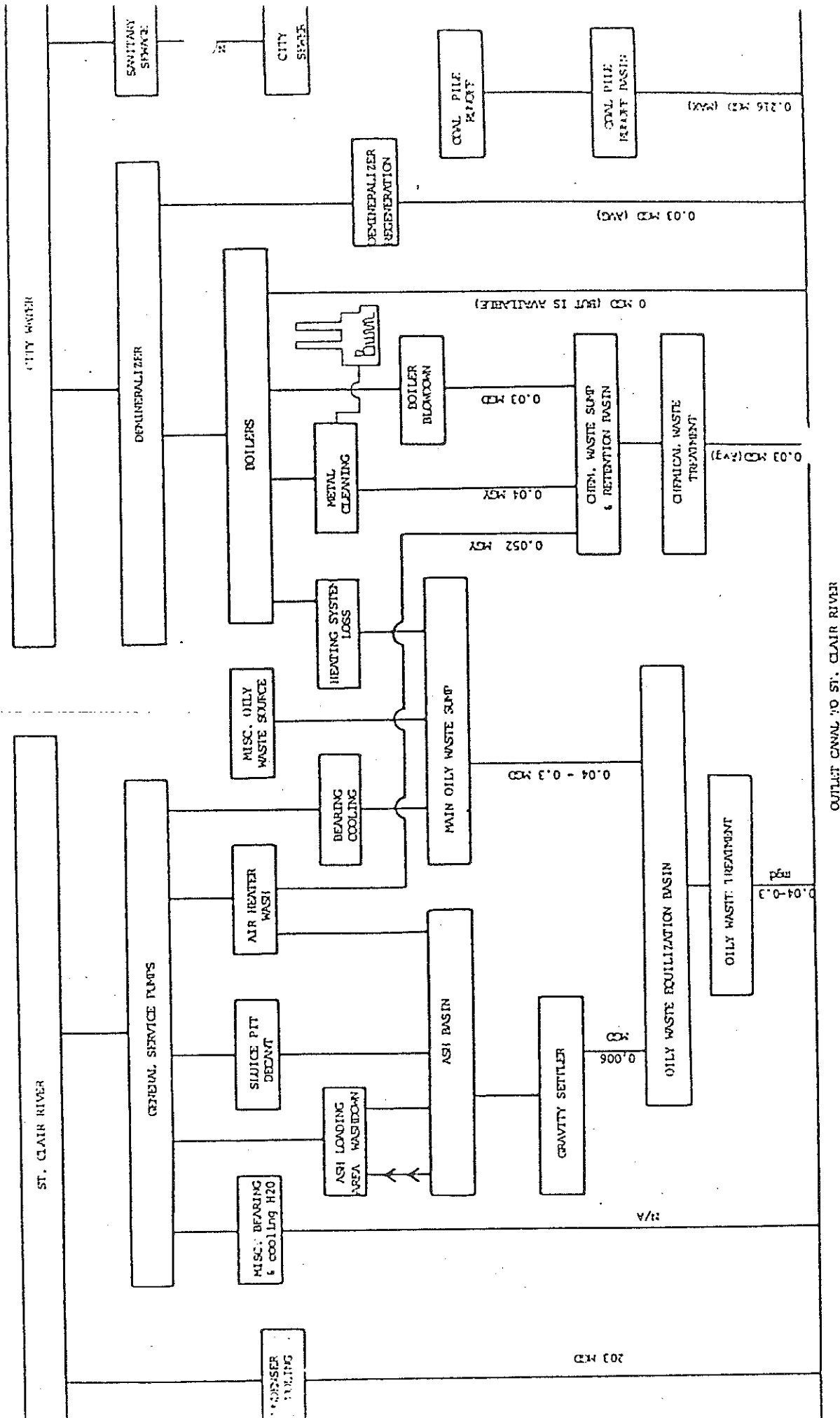
ST. CLAIR RIVER OUTFALL 001

DATA BASED UPON
1979 MONTHLY OPERATING REPORT

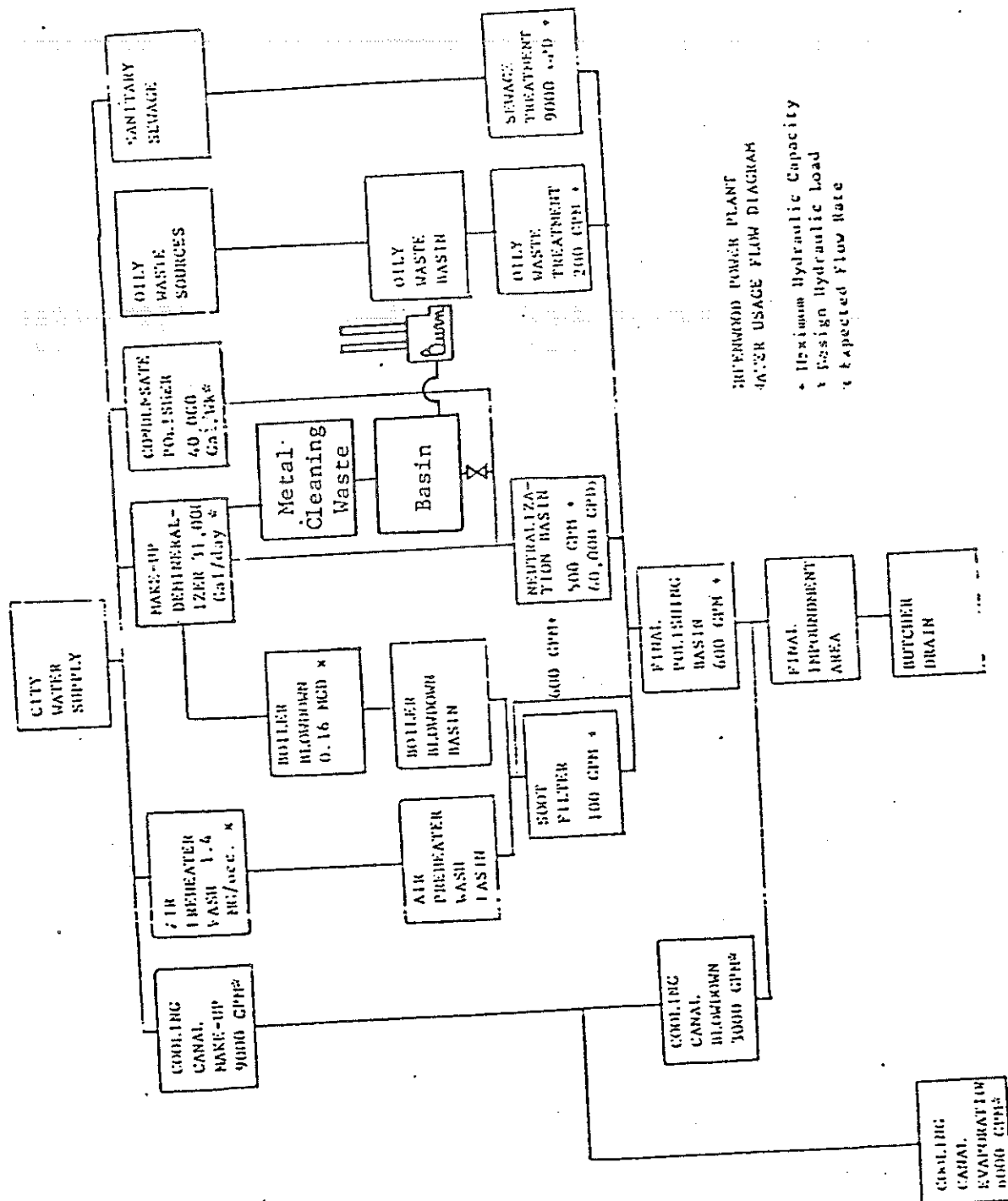
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LAKE MICHIGAN (WTFAL. COL

WINDSVILLE KIMER PLANT
Water Usage
September 1979

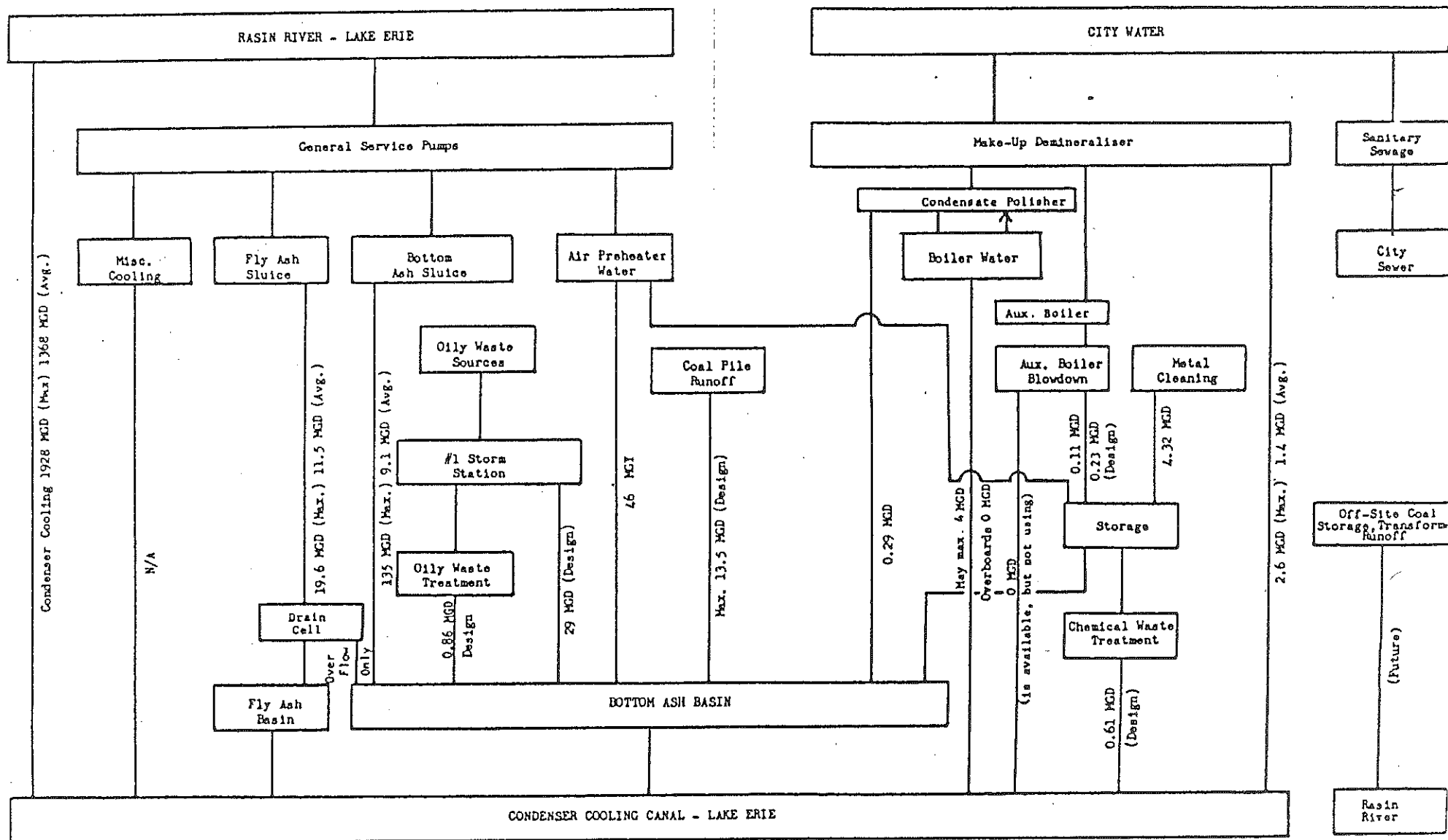


GREENWOOD POWER PLANT WATER USAGE FLOW DIAGRAM May, 1979



GREENWOOD POWER PLANT
 WATER USAGE FLOW DIAGRAM
 * Maximum Hydraulic Capacity
 † Design Hydraulic Load
 ‡ Expected Flow Rate

MONROE POWER PLANT
Water Usage
August 1979





UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

17 NOV 1982

Mr. Morton Sterling, Director of Environmental Affairs
Detroit Edison
2000 Second Avenue
Detroit, Michigan 48226

RE: Withdrawal of Part A (Exempted Waste)

FACILITY NAME: Detroit Edison

USEPA ID NO.: MID 000 721 548, MID 000 721 571, MID 000 809 608,
MID 000 718 379, MID 000 718 841, MID 041 813 098,
MID 092 175 074 (See Attached List)

Dear Mr. Sterling:

This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of January 26, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility only treats, stores or disposes of waste listed in 40 CFR Part 261.4 (enclosed), which are exempt from regulations at this time.

It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you still must comply with all applicable State and local requirements.

You will retain your USEPA Identification number if you notified as a generator or transporter of hazardous waste.

Please contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Exempted Wastes)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Mr. C. M. Heidel, Executive Vice President
MDNR

Facilities - Detroit Edison
(Exempted Waste)

St. Clair Power Plant	MID 000 721 548
Trenton Channel Power Plant	MID 000 721 571
Conners Creek Power Plant	MID 000 809 608
River Rouge Power Plant	MID 000 718 379
Belle River Power Plant	MID 000 718 841
Marysville Power Plant	MID 041 813 098
Monroe Power Plant	MID 092 175 074

PS Form 3811, Jan. 1979

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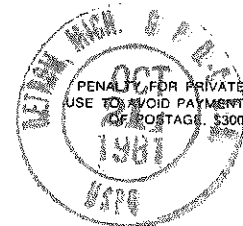
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